

**BellSouth Telecommunications, Inc.**

333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

**Guy M. Hicks**  
General Counsel

August 9, 2002

615 214 6301  
Fax 615 214 7406

RECEIVED  
\*02 AUG 9 PM 2 06  
TN REGULATORY AUTHORITY  
DOCKET ROOM

Hon. Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Docket to Establish Generic Performance Measurements, Benchmarks  
and Enforcement Mechanisms for BellSouth Telecommunications, Inc.*  
Docket No. 01-00193

Dear Chairman Kyle:

Recently, the Florida Public Service Commission ("FPSC") adopted 6 additional change control measures. These measures are as follows:

- CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days
- CM-7: Percent of Change Requests Accepted or Rejected Within 10 Days
- CM-8: Percent of Change Requests Rejected
- CM-9: Number of Defects in Production Releases (Type 6 CR)
- CM-10: Software Validation
- CM-11: Percent of Change Requests Implemented Within 60 Weeks of Prioritization<sup>1</sup>

Copies of the SQM pages for these measures are attached to this letter.

As the Authority is aware, several state commissions and the FCC have focused attention on BellSouth's CCP process. Consequently, BellSouth will report regional data collected in accordance with these measures in Tennessee in

---

<sup>1</sup> Acceptance of change requests is subject to technical feasibility, cost, and industry standards. See Section 4, Part 2, Types 2-5 Process Flow, Step 3.

Tennessee Regulatory Authority

August 9, 2002

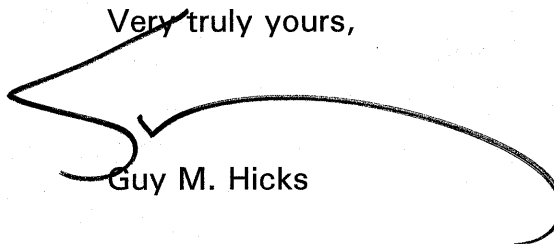
Page 2

conjunction with its monthly data reporting. BellSouth will begin reporting data on these measures with August data (reported in September and October).

In conjunction with the new measures, the FPSC ordered BellSouth to pay penalties on measures CM-6, CM-7 and CM-11. Because of the FCC's focus on CCP, BellSouth is voluntarily agreeing to pay Tier II penalties on these same three measures (CM-6, CM-7 and CM-11), as set forth in the attached SQM pages, in Tennessee pursuant to the Georgia Performance Plan until December 1, 2002 and then pursuant to the Service Quality Measurement Plan and Self-Effectuating Enforcement Mechanism adopted by the FPSC in Docket No. 000121-TP on February 14, 2002.

While BellSouth will begin voluntarily implementing these measures as described herein, BellSouth also respectfully requests that the Authority accept this amendment to the performance plan to incorporate these six measures and the associated penalties. Please let me know if you have any questions about the information contained in this letter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Guy M. Hicks", with a long, sweeping horizontal stroke extending to the right.

GMH:ch

## CM-6: Percent of Software Errors Corrected in X (10, 30, 45) Business Days

### Definition

Measures the percent of Software Errors corrected by BellSouth in X (10, 30, 45) business days within the report period.

### Exclusions

- Software Corrections having implementation intervals that are longer than those defined in this measure and agreed upon by the CLECs.

### Business Rules

This metric is designed to measure BellSouth's performance in correcting identified Software Errors within the specified interval. The clock starts when a Software Error is validated per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html), and stops when the error is corrected and notice is posted to the Change Control Website. Software defects are defined as Type 6 Change Requests in the Change Control Process.

### Calculation

**Percent of software Errors Corrected in X (10, 30, 45) Business Days =  $(a \div b) \times 100$**

- a = Total number of Software Errors corrected where "X" = 10, 30, or 45 business days.
- b = Total number of Software Errors requiring correction where "X" = 10, 30, or 45 business days.

### Report Structure

- Severity 2 = 10 Business Days
- Severity 3 = 30 Business Days
- Severity 4 = 45 Business Days

### Data Retained

- Report Period
- Total Completed
- Total Completed Within X Business Days
- Disputed, Rejected or Reclassified Software Errors

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
	Tier I	
Yes	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-7: Percent of Change Requests Accepted or Rejected Within 10 days

### Definition

Measures the percent of Change Requests other than Type 1 or Type 6 Change Requests, submitted by CLECs that are Accepted or Rejected by BellSouth in 10 business days within the report period.

### Exclusions

- Change Requests that are canceled or withdrawn before a response from BellSouth is due.

### Business Rules

The Acceptance/Rejection interval starts when the acknowledgement is due to the CLEC per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). The clock ends when BellSouth issues an acceptance or rejection notice to the CLEC. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent of Change Requests Accepted or Rejected within 10 Business Days =  $(a \div b) \times 100$

- a = Total number of Change Requests accepted or rejected within 10 business days.
- b = Total number of Change Requests submitted in the reporting period.

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Requests Accepted or Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval

### SEEM Measure

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
• Region	• 95% within interval

## CM-8: Percent Change Requests Rejected

### Definition

Measures the percent of Change Requests other than (Type 1 or Type 6 Change Requests) submitted by CLECs that are rejected by reason within the report period.

### Exclusions

- Change Requests that are cancelled or withdrawn by CLEC before a response from BellSouth is due.

### Business Rules

This metric includes any rejected change requests in the reporting period, regardless of whether received early or late. The metric will be disaggregated by major categories of rejections per the Change Control Process, a copy of which can be found at [http://www.interconnection.bellsouth.com/markets/lec/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lec/ccp_live/index.html). These reasons are: Cost, Technical Feasibility, and Industry Direction. This metric includes all change requests not subject to the above exclusions, not just those received and accepted or rejected in the same reporting period.

### Calculation

Percent Change Requests Rejected =  $(a \div b) \times 100$

- a = Total number of Change Requests rejected.
- b = Total number of Change Requests submitted within the report period.

### Report Structure

- BellSouth Aggregate
- Cost
- Technical Feasibility
- Industry Direction

### Data Retained

- Report Period
- Requests Rejected
- Total Requests

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Region</li> <li>• Reason – Cost</li> <li>• Reason – Technical Feasibility</li> <li>• Reason – Industry Direction</li> </ul>	<ul style="list-style-type: none"> <li>• Diagnostic</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	

### SEEM Disaggregation - Analog/Benchmark

SEEM Disaggregation	SEEM Analog/Benchmark
<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Not Applicable</li> </ul>

## CM-9: Number of Defects in Production Releases (Type 6 CR)

### Definition

Measures the number of defects in Production Releases. This measure will be presented as the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definition of Type 6 Change Requests (CR) and Severity 1, Severity 2, and Severity 3 defects can be found in the Change Control Process Document.

### Exclusions

None.

### Business Rules

This metric measures the number of Type 6 Severity 1 defects, the number of Type 6 Severity 2 defects without a mechanized work around, and the number of Type 6 Severity 3 defects resulting within a three week period from a Production Release date. The definitions of Type 6 Change Requests (CR) and Severity 1, 2, and 3 defects can be found in the Change Control Process, which can be found at [http://www.interconnection.bellsouth.com/markets/lcc/ccp\\_live/index.html](http://www.interconnection.bellsouth.com/markets/lcc/ccp_live/index.html).

### Calculation

- The number of Type 6 Severity 1 Defects, the number of Type 6 Severity 2 Defects without a mechanized work around, and the number of Type 6 Severity 3 defects.

### Report Structure

- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

### Data Retained

- Region
- Report Period
- Production Releases
- Number of Type 6 Severity 1 defects
- Number of Type 6 Severity 2 defects without a mechanized work around
- Number of Type 6 Severity 3 defects

## SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
<ul style="list-style-type: none"> <li>Region--Number of Type 6 Severity 1 defects</li> <li>Region--Number of Type 6 Severity 2 defects without a mechanized work around</li> <li>Region--Number of Type 6 Severity 3 defects</li> </ul>	<ul style="list-style-type: none"> <li>0 Defects</li> <li>0 Defects</li> <li>0 Defects</li> </ul>

### SEEM Measure

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
• Not Applicable	•

## CM-10: Software Validation

### Definition

Measures software validation test results for Production Releases of BellSouth Local Interfaces.

### Exclusions

None

### Business Rules

BellSouth maintains a test deck of transactions that are used to validate that functionality in software Production Releases work as designed. Each transaction in the test deck is assigned a weight factor, which is based on the weights that have been assigned to the metrics. Within the software validation metric weight factors will be allocated among transaction types (e.g., Pre-Order, Order Resale, Order UNE, Order UNE-P) and then equally distributed across transactions within the specific type.

BellSouth will begin to execute the software validation test deck within one (1) business day following a Production Release. Test deck transactions will be executed using Production Release software in the CAVE environment. Within seven (7) business days following completion of the Production Release software validation test in CAVE, BellSouth will report the number of test deck transactions that failed. Each failed transaction will be multiplied by the transaction's weight factor.

A transaction is considered failed if the request cannot be submitted or processed, or the results in incorrect or improperly formatted data.

### Calculation

**This software validation metric is defined as the ratio of the sum of the weights of failed transactions using Production Release software in CAVE to the sum of the weights of all transaction in the test deck.**

- Numerator = Sum of weights of failed transactions
- Denominator = Sum of weights of all transactions in the test deck

### Report Structure

- BellSouth Aggregate

### Data Retained

- Report Period
- Production Release Number
- Test Deck Weights
- % Test Deck Weight Failure

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• ≤ 5%



**SEEM Measure**

SEEM Measure		
No	Tier I	
	Tier II	
	Tier III	

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation	SEEM Analog/Benchmark
•	•

## CM-11: Percent of Change Requests Implemented Within 60 weeks of Prioritization

### Definition

Measures whether BellSouth provides CLECs timely implementation of prioritized change requests.

### Exclusions

- Change requests that are implemented later than 60 weeks with the consent of the CLECs.
- Change requests for which BellSouth has regulatory authority to exceed the interval

### Business Rules

This metric is designed to measure BellSouth's performance in implementing prioritized change requests. The clock starts when a change request has been prioritized as described in the Change Control Process. The clock stops when the change request has been implemented by BellSouth and made available to the CLECs. BellSouth will begin reporting this measure with the next release for diagnostic purposes, and will be measured for SEEM purposes 60 weeks from first prioritization meeting following Commission approval of this measure.

### Calculation

**Percent of Type 5 CLEC initiated Change Requests implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 5 CLEC initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 5 CLEC initiated Change Requests from the date of the release prioritization list

**Percent of Type 4 BellSouth initiated Change Requests implemented on time =  $(a \div b) \times 100$**

- a = Total number of prioritized Type 4 BellSouth initiated Change Requests that are less than or equal to 60 weeks of age from the date of the release prioritization list
- b = Total number of prioritized Type 4 BellSouth initiated Change Requests from the date of the release prioritization list

### Report Structure

- BellSouth Aggregate
- Type 4 requests implemented
- Type 5 requests implemented
- % implemented within 16, 32, 48, and 60 weeks

### Data Retained

- Region
- Report Month
- Total implemented by type
- Total implemented within 60 weeks

### SQM Level of Disaggregation - Analog/Benchmark

SQM Level of Disaggregation	SQM Analog/Benchmark
• Region	• 95% within interval
• Type 4 requests implemented	• 95% within interval
• Type 5 requests implemented	• 95% within interval

**SEEM Measure**

SEEM Measure		
Yes	Tier I	
	Tier II	Yes

**SEEM Disaggregation - Analog/Benchmark**

SEEM Disaggregation		SEEM Analog/Benchmark	
• Region		• 95% within interval	

### CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2002, a copy of the foregoing document was served on the following parties, via the method indicated:

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

James Lamoureux, Esquire  
AT&T  
1200 Peachtree St., NE  
Atlanta, GA 30309

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Henry Walker, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

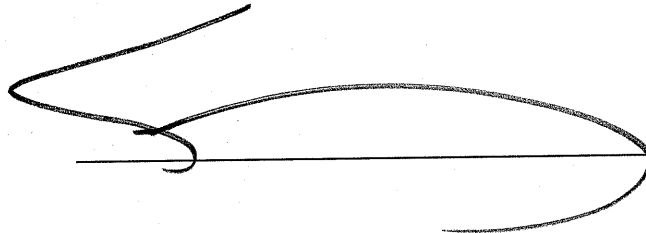
Jon E. Hastings, Esquire  
Boult, Cummings, et al.  
P. O. Box 198062  
Nashville, TN 37219-8062

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Charles B. Welch, Esquire  
Farris, Mathews, et al.  
618 Church St., #300  
Nashville, TN 37219

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Dana Shaffer, Esquire  
XO Communications, Inc.  
105 Malloy Street  
Nashville, TN 37201

A large, stylized handwritten signature in black ink, consisting of a long horizontal stroke with a large loop at the end and a smaller loop at the beginning.